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Attorneys for Plaintiff Kristen L. Hartman

Additional Attorneys Listed on Signature Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DUSTIN GORMLEY, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon corporation,

Defendant.

Coordinated Case No. 11-cv-00893-SI

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER RE CONSOLIDATION OF ACTION
AND CONSOLIDATED COMPLAINT**

Hon. Susan Illston
Courtroom 10, 19th Floor

ERIKA MCCARTNEY, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

NIKE, Inc., an Oregon corporation; and
DOES 2 through 20,

Defendants.

Case No. 11-cv-01588-SI

1 KRISTEN L. HARTMAN, an individual, on
2 behalf of herself and all others similarly
situated,

3 Plaintiff,

4 v.

5 NIKE USA, INC., an Oregon Corporation;
6 NIKE RETAIL SERVICES, INC., an Oregon
Corporation, and DOES 1 through 50,
7 inclusive,

8 Defendants.

Case No. 11-cv-02451 SI

9
10 Plaintiffs Dustin Gormley, Erika McCartney, and Kristen L. Hartman (“plaintiffs”) and
11 defendants Nike, Inc., Nike USA, Inc., and Nike Retail Services, Inc., by and through their
12 respective counsel, jointly submit the following Stipulation regarding consolidation of the
13 above-referenced actions for all purposes and the filing of plaintiffs’ consolidated complaint on
14 or before November 11, 2011.

15 **RECITALS**

16 **WHEREAS**, on July 20, 2011, Judge Illston issued an order coordinating the above-
17 captioned related cases (*Gormley v. Nike, Inc.*, Coordinated Case No. 11-cv-00893-SI, ECF No.
18 31); and

19 **WHEREAS**, the parties agree that the above-referenced actions should be consolidated for
20 all purposes because it will promote the interests of judicial economy and efficiency; and

21 **WHEREAS**, the parties agree that plaintiffs should file a consolidated complaint;

22 **STIPULATION**

23 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their
24 respective counsel of record, that (1) the above-referenced actions shall be consolidated for all
25 purposes, and (2) that plaintiffs shall file a consolidated complaint on or before November 11,
26 2011.

27 ///

28 ///

1 **IT IS SO STIPULATED.**

2 Dated: November 11, 2011

COOLEY LLP
MICHELLE C. DOOLIN
JENNIFER M. FRENCH
BEATRIZ MEJIA
MATTHEW M. BROWN

6 /s/Beatriz Mejia

Beatriz Mejia
Attorneys for Defendants
NIKE, INC., NIKE USA, INC., AND NIKE
RETAIL SERVICES, INC.

9 Dated: November 11, 2011

HOFFMAN & LAZEAR
H. TIM HOFFMAN
ARTHUR W. LAZEAR
CHAD A. SAUNDERS

12 /s/Chad A. Saunders

Chad A. Saunders

Attorneys for Plaintiff
DUSTIN GORMLEY

15 Dated: November 11, 2011

PACIFIC JUSTICE CENTER
ROBERT B. HANCOCK
MELVIN B. PEARLSTON

18 /s/Robert B. Hancock

Robert B. Hancock

Attorneys for Plaintiff
ERIKA MCCARTNEY

21 Dated: November 11, 2011

FINEMAN & ASSOCIATES
NEIL B. FINEMAN

23 /s/Neil B. Fineman

Neil B. Fineman

Attorneys for Plaintiff
ERIKA MCCARTNEY

1 Dated: November 11, 2011

STONEBARGER LAW, APC
GENE J. STONEBARGER
RICHARD D. LAMBERT

3
4 /s/ Gene J. Stonebarger
Gene J. Stonebarger

5 Attorneys for Plaintiff
6 KRISTEN L. HARTMAN

7
8 **FILER'S ATTESTATION**

9 Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that
10 all parties have concurred in the filing of this Joint Stipulation and [Proposed] Order re
11 Consolidation of Action and Consolidated Complaint.

12
13 Dated: November 11, 2011

STONEBARGER LAW, APC
GENE J. STONEBARGER
RICHARD D. LAMBERT

15
16 /s/ Gene J. Stonebarger
Gene J. Stonebarger

17 Attorneys for Plaintiff
18 KRISTEN L. HARTMAN

19
20 **IT IS SO ORDERED.**

21
22 Dated: 11/15/11

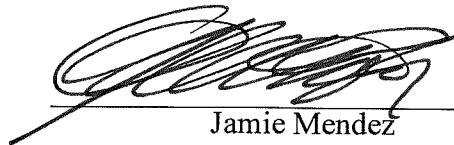


23 The Honorable Susan Illston
United States District Judge

24
25 Related Case 11-1588 and 11-2451 shall be administratively
26 closed.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 11, 2011, the foregoing **JOINT STIPULATION AND [PROPOSED] ORDER RE CONSOLIDATION OF ACTION AND CONSOLIDATED COMPLAINT** was filed electronically with the Clerk of the Court to be served by operation of the Court's CM/ECF electronic filing system to all counsel of record.



Jamie Mendez

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